



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
SAM NUNN
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA GEORGIA 30303-8960

July 26, 2010

Ms. Linda A. DeVine
ATI EIS Project Manager
HQ ACC/A7ZP
129 Andrews Street, Room 337
Langley AFB, VA 23665-2769

**Subject: EPA Comments on the Airspace Training Initiative (ATI)
Final Environmental Impact Statement (FEIS)
Shaw Air Force Base, South Carolina
CEQ No. 20100234; ERP No. UAF-E11057-00 (dated June 2010)**

Dear Ms. DeVine:

Pursuant to its responsibilities under Section 102(2)(C) of the National Environmental Policy Act and Section 309 of the Clean Air Act, the U.S. Environmental Protection Agency (EPA) has reviewed the subject document. The FEIS examines the potential environmental consequences of modifying the training airspace over parts of South Carolina and Georgia. The purpose of the Air Space Training Initiative (ATI) is to provide effective and realistic military training airspace for pilots that are stationed at Shaw Air Force Base (AFB) and McEntire Air National Guard Station (ANGS), South Carolina.

The FEIS examines several alternatives: a no-action, preferred alternative (Mitigated Proposed Action) and two additional action alternatives (Alternatives A and B). The preferred alternative includes establishing new Bulldogs C and E Military Operations Areas (MOA) beneath Bulldog B instead of expanding Bulldog A to the east to underlie and extend the boundaries to existing Bulldog B, developing electronic training transmitter sites; using chaff and flares in new airspace (Bulldog E and C) and continuing use in existing airspace; and implementing methods to avoid civilian and military conflicts (aircraft scheduling and exclusionary zones).

Following our comments on the Draft EIS (DEIS), several project components were eliminated. Specifically, gamecock MOA reviews or additions in South Carolina are no longer part of the preferred alternative. These exclusions and others include:

1. creating a new MOA/Air Traffic Control Assigned Airspace (ATCAA) (Gamecock E) over Poinsett Electronic Combat Range (ECR);
2. expanding Gamecock D to become Gamecock F;
3. combining and using Gamecock C and D concurrently and together;
4. returning Gamecock B to the National Airspace System; and
5. raising the ceiling of Poinsett MOA.

According to the FEIS, some of the training needs identified in the DEIS will be met through a agreement that allows training aircraft to travel between Gamecock D to Poinsett Range between 18,000 to 22,000 feet MSL.

Overall, the major environmental impacts of this proposal (noise, ground safety, earth/water resources, and fire effects) are adequately examined in the document. The FEIS addressed our DEIS concerns regarding airspace management/configuration/access, particularly around existing civilian airports within the State of Georgia and ongoing coordination. The Air Force is cooperating with the Federal Aviation Administration regarding the establishment of procedures to de-conflict the airspace. According to the FEIS, a minimum of 3 nautical miles and 1,500 feet vertical exclusionary areas has been identified around airports in new or modified airspace to de-conflict military training aircraft from areas immediate surrounding public airports. With the expansion of military airspace, it is reasonable to expect that managing aircraft traffic will become more demanding for FAA/range control personnel. Ongoing consultation (adaptive management) between all DOD user groups and FAA in consultation State and Local Transportation/Air Traffic Control entities should continue to ensure that any necessary changes to optimize safety and access can be made quickly (rather than after-the-fact).

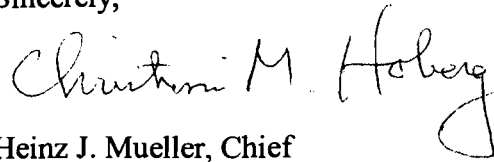
While noise (from aircraft ingress/egress and on-site gunnery) should not increase with implementation of the proposal, effects will spread out over a broader range and extend to lower elevations. Average noise levels from aircraft operations are not projected to exceed 55 DNLmr, after implementation of this proposal. However, noise levels increases of up to 12 DNLmr to 19 DNLmr are expected in some area and this would clearly be noticeable to the affected individuals. EPA considers these increases to be significant at any ambient level. The FEIS indicates that there would be a "noticeable increase in low-level over flights and military aircraft would become a noticeable contributor to noise levels under Bulldog C and E MOAs. The number of highly annoyed people could increase from approximately 1 percent of the population to 4 percent of the population."

According to the State of Georgia Department of Transportation, existing aircraft noise issues around the Louisville area are not being adequately addressed. However, the Air Force indicates that there is a community outreach program in place to ensure that the public is aware of special flying operations. In addition, the Air Force monitors community input and noise complaints. EPA recommends that the Air Force continue to work with communities within the project area to regularly apprise them of any proposed changes to military flight operations, including changes in frequency, duration, general flight paths, time of day/night, and noise levels associated with the training initiative. A Community Advisory Council to the Air Force should be developed with representatives from the area that will experience new or increased noise levels to help ensure that community needs, recommendations or concerns are identified and addressed by the Air Force. In new low-altitude airspace where low-level over flights will occur, EPA suggests that Air Force should make every effort to monitor and mitigate post-project noise, where appropriate, to ensure that it does not exceed proposed project parameters.

The FEIS also examined impacts of the proposed action on low-income and minority populations. While some counties within economically depressed, the FEIS concluded there would be no disproportionately high and adverse impacts to low-income populations. However, the justification for this conclusion is not adequately provided.

Thank you for the opportunity to review this document. If we can be of further assistance, please contact Ntale Kajumba at 404 562-9620 or kajumba.ntale@epa.gov.

Sincerely,



for

Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management